

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Online Payment Solutions Inc.,)
Plaintiff) Civil Action No. 07 CIV 8692 (PKL)
-against-)
Svenska Handelsbanken AB,)
Peter Lars Johansson, Nicholas Nolter,)
Eric Nolter aka Aryksin Nolter,)
Factor Europe UK Limited, DOES 1-10,)
Defendants.)

)

**AFFIRMATION OF
MILANA SALZMAN**

MILANA SALZMAN, an attorney duly admitted to practice in this District and the State of New York, affirms under penalty of perjury:

1. I am an associate with the law firm of White & Case LLP, counsel for Defendant Svenska Handelsbanken AB ("Svenska") in this action. I submit this Affirmation in support of the motion to dismiss filed by Svenska.
2. Attached hereto as Exhibit A is a true and correct copy of the Complaint filed in this action.
3. Plaintiff, Online Payment Solutions, Inc. ("OPS") threatened to sue Svenska over the facts alleged in the Complaint, via communications from Plaintiff's counsel, on or about March 22, 2007.
4. Attached hereto as Exhibit B is a true and correct copy of the Certified Certificate of Incorporation of Online Payment Solutions, Inc. ("OPS"), showing that OPS was incorporated in New York on March 6, 2007. Per the last page of Exhibit B, it appears that OPS was incorporated by Plaintiff's local counsel, Lynch Rowin LLP.

5. Attached hereto as Exhibit C is a true and correct copy of ECS World's ("ECS") contact information, as shown on ECS' official website, available at <http://www.ecs-world.com/contact.asp> (last visited on December 13, 2007).

6. Attached hereto as Exhibit D is a true and correct copy of ECS' business services description, as shown on ECS' official website, available at http://www.ecs-world.com/articles/high_risk_merchant_accounts.asp (last visited on December 13, 2007).

7. Attached hereto as Exhibit E is a true and correct copy of the Certificate of Incorporation for Factor Europe (UK) Limited.

8. Attached hereto as Exhibit F is a true and correct copy of the Swedish corporate registration document for Scandinavian Net Logistics AB.

9. Attached hereto as Exhibit G is a true and correct copy of an Internet forum discussion regarding Defendant Nicholas Nolter, dated March 3, 2001, available at <http://www.bettorsworld.com/web/forums/printthread.php?t=7547> (last visited on December 19, 2007).

10. Attached hereto as Exhibit H is a true and correct copy of an Internet forum discussion regarding Defendant Nicholas Nolter, dated April 6, 2003, available at <http://forum.truegambler.com/textthread.cfm?catid=2&threadid=847> (last visited on December 19, 2007).

11. Attached hereto as Exhibit I is a true and correct copy of an Internet forum discussion regarding Defendant Nicholas Nolter, dated March 29 and 30, 2004, available at <http://forum.truegambler.com/textthread.cfm?catid=42&threadid=1738> (last visited on December 19, 2007).

12. Attached hereto as Exhibit J is a true and correct copy of "Hideous Figures in the World of Online Gambling and Where They Are Now," which includes a description of Defendant Nicholas Nolter, as published on the Internet on May 9, 2004, available at <http://www.gambling911.com/infamous.html> (last visited December 19, 2007).

13. Attached hereto as Exhibit K is a true and correct copy of the Complaint in the matter styled United States v. \$438,035.52 Withdrawn from Fifth Third Bank Acct. No. 1810008110, Civil Action No. 3:03-CV-0044RLY-WGH, filed on February 28, 2003 in the U.S. District Court for the Southern District of Indiana, Evansville Division ("United States v. \$438,035.52").

14. Attached hereto as Exhibit L is a true and correct copy of the Verified Statement of Interest filed by Nicholas Nolter on April 25, 2003 in the matter styled United States v. \$438,035.52.

Dated: New York, New York
December 21, 2007



Milana Salzman